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December 10, 2021

Via ECF

Hon. Taryn A. Merkl
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, NY 11201

Re: *Sheehan v. ConsenSys, Inc.*
19-cv-04154 (DLI) (CLP)

Dear Judge Merkl:

This firm represents the defendant ConsenSys, Inc. (“Defendant”). I write pursuant to the Court’s October 8, 2021 minute entry to report on the status of this case.¹

As the Court will recall, at the parties’ status conference before Your Honor on October 7, 2021, Plaintiff’s counsel indicated that Plaintiff was still unable to participate in discovery in the case, with no end in sight. On the morning of October 22, 2021, Plaintiff’s counsel offered to settle this matter on terms which were unacceptable to Defendant. Later that morning, Defendant made a counterproposal, to which Plaintiff did not respond.

Defendant remains ready to continue discovery.

Respectfully submitted,

/s/

Michael J. Goettig

cc: Jordan El-Hag, Esq. (*via ECF*)

¹ The Court’s minute entry calls for counsel to file a joint status report. At 12:22 PM today, Defendant sent by electronic mail a draft of this submission to counsel for the plaintiff Ryan Sheehan (“Plaintiff”) for his review and input. As of the time of this filing, Defendant has received no response.